

United States District Court
for the
Southern District of New York
Related Case Statement

Full Caption of Later Filed Case:

VENESSA DOBNEY

Plaintiff	Case Number
vs.	1:23-cv-05380
THE WALT DISNEY COMPANY, AMERICAN BROADCASTING COMPANIES, INC., ELIZABETH BARRETT, and RICHARD McHALE	
Defendant	

Full Caption of Earlier Filed Case:

(including in bankruptcy appeals the relevant adversary proceeding)

VENESSA DOBNEY

Plaintiff	Case Number
vs.	23-CV-2282-JPO
THE WALT DISNEY COMPANY, AMERICAN BROADCASTING COMPANIES, INC., ELIZABETH BARRETT, and RICHARD McHALE	
Defendant	

Status of Earlier Filed Case:

☐

Closed

(If so, set forth the procedure which resulted in closure, e.g., voluntary dismissal, settlement, court decision. Also, state whether there is an appeal pending.)

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Open

(If so, set forth procedural status and summarize any court rulings.)

On March 16, 2023, plaintiff Venessa Dobney filed a complaint against the defendants in the U.S. District Court for the Southern District of New York. In response to the complaint, defendants filed a motion to dismiss for failure to state a claim. On June 23, 2023, while defendants motion to dismiss was pending, plaintiff filed a notice of voluntary dismissal.

Explain in detail the reasons for your position that the newly filed case is related to the earlier filed case.

The complaints in both cases involve the same plaintiff, the same four defendants, and the same claims of alleged race-based discrimination in employment and retaliation.

Signature: /s/ Stephanie Sanon Date: 6/25/2023

Firm: McDermott Will & Emery LLP
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